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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

MINA DE ORO, LLC, a Nevada limited liability company; THE TOY CHEST, LLC a Nevada limited liability company,

Case No. 2:20-cv-00994

Plaintiffs,

V.

MATTHEW BRENT GOETTSCHE, an individual, JOBEDIAH SINCLAIR WEEKS, an individual, JOSEPH FRANK ABEL, an individual, SILVIU CATALIN BALACI, an individual, BITCLUB, an unknown entity, and DOE and ROE Corporations,

**AMENDED MOTION FOR ENTRY
OF CLERKS DEFAULT**

Defendants.

Plaintiffs, MINA DE ORO, LLC, and THE TOY CHEST, LLC, (hereinafter "Plaintiffs"), by and through their counsel, the Law Offices of P. Sterling Kerr, hereby move this Court for entry of the default of Defendant JOSEPH FRANK ABEL in this case.

It appearing from the files and records in the above-entitled action that Defendant, JOSEPH FRANK ABEL being duly served on the 13th day of October 2020, with the Summons, and Complaint; that more than twenty-one (21) days, exclusive of the day of service, having expired since service upon Defendant; and that no answer or other appearance having been filed and no further time having been granted, the Default of Defendant for failing to answer or, move, or otherwise plead within the time set forth in the summons is hereby entered.

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1 A copy of the proposed Default is attached hereto as Exhibit A.
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3 Dated this ____ day of February 2021.
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5 DEBRA K. KEMPI, CLERK
6

7 By: _____
8 Deputy Clerk
9

10 Date: _____
11

12 Respectfully submitted,
13

14 LAW OFFICES OF P. STERLING KERR
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17 _____
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